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Before The
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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MAY - 1 1997

Federal Communications Commission
Office of Secretary

In the Matter of)

MCI TELECOMMUNICATIONS CORPORATION)

Petition For Declaratory Ruling)

Regarding the Joint Marketing)

Restriction in Section 271(e)(1) of the)

Communications Act of 1934, as amended)

by the Telecommunications Act of 1996)

C C Docket No. 96-149

To: The Commission

PETITION FOR DECLARATORY RULING

MCI Telecommunications Corporation (MCI), pursuant to Section 1.2 of the Commission's Rules and Regulations, 47 C.F.R. § 1.2, hereby requests that the Commission issue a declaratory ruling to terminate a significant controversy and remove substantial uncertainty in the marketplace. As discussed below, the Commission should explain how the rules it recently adopted concerning joint marketing by certain interexchange carriers of interexchange and resold Bell Operating Company (BOC) local exchange services would apply to MCI marketing materials that Pacific Bell contends violate those rules. Ameritech has also filed an informal complaint and a formal complaint challenging MCI's use of marketing materials.

The Law

Section 271(e)(1) of the Communications Act of 1934, added by the Telecommunications Act of 1996 (1996 Act),^{1/} restricts the

¹ Pub. L. No. 104-104, 110 Stat. 56.

three largest long distance carriers from jointly marketing their long distance services with resold BOC local exchange service until the earlier of February 8, 1999 or the date when a BOC is allowed to enter the long distance market in a given state.^{2/} On December 24, 1996, the Commission issued the Non-Accounting Safeguards Order, in which it discussed the marketing practices that it interpreted Section 271(e)(1) to proscribe and to permit.^{3/} The Commission ruled that the following specific restrictions apply to a long distance carrier's marketing of long distance and resold BOC local exchange services prior to a BOC's entry into long distance service in a given state. A covered long distance carrier may not:

- (A) combine long distance with resold BOC local services and provide a discount for both;^{4/}

² Section 271(e)(1) of the Communications Act provides, in relevant part: "Until a Bell operating company is authorized ... to provide interLATA services in an in-region State, or until 36 months have passed since [February 8, 1996], whichever is earlier, a telecommunications carrier that serves greater than 5 percent of the Nation's presubscribed access lines may not jointly market in such State telephone exchange service obtained from such Company [for resale] with interLATA services offered by that telecommunications carrier." MCI exceeds the "5 percent" threshold set forth in the statute and, accordingly, this provision applies to it.

³ First Report and Order and Further Notice of Proposed Rulemaking, Implementation of the Non-Accounting Safeguards of Sections 271 and 272 of the Communications Act of 1934, as amended, CC Docket No. 96-149, FCC 96-489 (rel. December 24, 1996) (Non-Accounting Safeguards Order), petitions for recon. pending.

⁴ Non-Accounting Safeguards Order at ¶ 277.

- (B) condition the availability of either long distance or resold BOC local service on the purchase of the other;^{5/}
- (C) offer long distance and resold BOC local service as a single combined product;^{6/}
- (D) market long distance and resold BOC local service through a single transaction;^{7/} or
- (E) mislead the public in an advertisement for both long distance and resold BOC local service by stating or implying that it can offer (A)-(D) above.^{8/}

These are the only express constraints applicable to the joint marketing by covered long distance carriers of their long distance and resold BOC local exchange services. Given the policy in the 1996 Act favoring entry into local markets through resale as well as other methods, the First Amendment implications of any curb on advertising, and the absence of any structural separation requirements for long distance carriers like those established for the BOCs in Section 272(b) of the Act, MCI submits that this category of restricted marketing undertakings should not be enlarged. Expansion of these categories, and uncertainty about whether these categories would be expanded and applied in inconsistent ways by different state commissions, would have a chilling effect on long distance carrier marketing

⁵ Id.

⁶ Id.

⁷ Id. at ¶ 278. A "single transaction" is defined as "the use of the same sales agent to market both products to the same customer during a single communication."

⁸ Id. at ¶ 280.

endeavors. Deterrence of entry into local markets by any carriers, including the three interexchange carriers singled out by Section 271(e)(1), would harm consumers who, until now, have never had alternatives available to them for their local service.^{9/}

The Non-Accounting Safeguards Order explicitly permitted a variety of marketing and other activities that the Commission found were not prohibited by Section 271(e)(1):

- (A) Other than misleading advertisements, referred to above, a covered long distance carrier may advertise the availability of interLATA services and resold BOC local services in a single advertisement;^{10/}
- (B) After a customer subscribes to both interLATA and resold BOC local services from a covered long distance carrier, that carrier may provide joint "customer care" (i.e., a single bill for both services and a single point of contact for maintenance, repairs and other customer services);^{11/}
- (C) Because Section 271(e)(1) applies only to activities that take place "prior to a customer's decision to subscribe," once a customer decides to subscribe to both interLATA and resold BOC local services from a covered long distance carrier, that carrier may market any new services to such subscriber.^{12/}

⁹ In this regard, long distance carriers would be reluctant to initiate aggressive marketing campaigns out of fear that their undertakings, while not problematic under the current "rules," might be found unlawful following a complaint or other action brought by a BOC before a state PUC.

¹⁰ Non-Accounting Safeguards Order at ¶ 280.

¹¹ Id. at ¶ 281.

¹² Id.

The Marketplace

On March 12, 1997, Pacific Bell filed with the California Public Utilities Commission (CPUC) a "Complaint" against MCI and AT&T, along with a "Motion Of Pacific Bell (U 1001 C) For Temporary Restraining Order And Preliminary Injunction And Memorandum Of Points And Authorities In Support Thereof."^{13/} Pacific Bell has recently supplemented its Complaint. Those requests for relief are pending before that agency at this time and, at least in part, precipitated the filing of this Petition. Ameritech has also filed an informal complaint before this Commission relating to similar materials^{14/} and, more recently, a formal complaint challenging an MCI advertisement relating to its facilities-based local service.^{15/} It is foreseeable that other BOCs will take similar actions against MCI (and other long distance carriers as well) in various fora around the nation.

This threat of widespread challenges to MCI's marketing undertakings creates the prospect of several state commission or court "interpretations" of a federal statute and the Commission's Non-Accounting Safeguards Order, some of which reasonably may be expected to be inconsistent and contradictory. The Commission

¹³ Pacific Bell (U 1001 C) v. AT&T Communications of California, Inc. (U 5002 C) and MCI Telecommunications Corporation (U 5001 C), Case No. 97-03-016 (filed March 12, 1997).

¹⁴ See Notice of Informal Complaint, Ameritech, IC-97-00440 (Nov. 26, 1996).

¹⁵ See Ameritech Corporation v. MCI Telecommunications Corporation, File No. E-97-17 (filed April 9, 1997).

correctly recognized in the Non-Accounting Safeguards Order that uniform national rules concerning the joint marketing restriction were necessary and that further explanations of the rules it announced in that order would likely be necessary.^{16/} MCI submits that the time for such further clarification has now arrived. Without it, consumer confusion will result, and carriers, whose marketing initiatives are nationwide in scope, will be faced with various challenges and directives involving their use of the same marketing materials in different jurisdictions. The MCI marketing materials now in use present a sound basis for the Commission to explain how the principles announced in the Non-Accounting Safeguards Order apply to specific marketing practices.^{17/}

The Legality of MCI's Marketing Materials

It should be emphasized that Commission guidance concerning Section 271(e)(1) did not exist until the Non-Accounting Safeguards Order. Accordingly, MCI is requesting a ruling here

¹⁶ Non-Accounting Safeguards Order at ¶ 282.

¹⁷ The Commission's authority to issue declaratory rulings has been recognized on numerous occasions. See, e.g., North Carolina Util. Comm'n v. FCC, 537 F.2d 787, 790 n. 2 (4th Cir.), cert. denied, 429 U.S. 1027 (1976); New York State Comm'n on Cable Television v. FCC, 749 F.2d 804, 815 (D.C. Cir. 1984); New York State Comm'n on Cable Television v. FCC, 669 F.2d 58, 62 n.9 (2d Cir. 1982). Declaratory relief is especially appropriate where confusion over the meaning and application of a particular policy or rule threatens to result in unnecessary litigation if left unaddressed, especially where conflicting interpretations may arise in different jurisdictions. See Public Utility Commission of Texas v. FCC, 886 F.2d 1325 (D.C. Cir. 1989); Cox Cable Communications Inc., 102 FCC 2d 110 (1985).

only as to the types of marketing materials it has been using since the release of that order. The marketing materials used by MCI to promote and sell its long distance and resold local exchange services following the Commission's adoption of the Non-Accounting Safeguards Order are lawful in all respects. They are fully consistent with the statute, the Commission's interpretation of the law, and the interests of consumers in emerging competitive markets. Furthermore, as noted below, Commission-imposed restrictions on MCI's ability to market its service offerings cannot be read to apply more broadly than intended by the Commission or permitted by law and the U.S. Constitution.

In the action brought by Pacific Bell against MCI before the CPUC, three MCI advertisements are claimed to be unlawful under Section 271(e)(1) of the Act. All predate the Non-Accounting Safeguards Order, and none of them is being used currently. Two of them, however, are similar to mailings that are still in use or may be used in the future. Those two mailings, it should be noted, were sent only to MCI long distance customers. As MCI had already successfully sold those customers long distance service, the mailers could not constitute prohibited joint marketing in any event.

The two mailings attached to Pacific Bell's CPUC complaint that are similar to those currently in use or that may be used in the future clearly market local service, rather than both local and long distance services. One states that "[a]s an MCI long

distance customer, you know we're committed to providing the highest levels of quality and service, 24 hours a day, 7 days a week." It also promises, to those current long distance customers who also sign up for resold local service, joint customer care -- "one call to one company for customer service" and "one easy-to-read monthly statement for both your local and long distance calls." (A copy of that mailing is appended as Exhibit A.) The other similarly promises to existing MCI long distance customers "One company ... one bill ... one call."^{18/} (A copy of that communication is appended as Exhibit B.) The Non-Accounting Safeguards Order specifically permitted such advertising of joint customer care.^{19/} Accordingly, neither of those mailings, nor any currently in use,^{20/} violates the Commission's express joint marketing prohibitions.

Moreover, none of the mailings attached to this petition could constitutionally be found to violate Section 271(e)(1), given the First Amendment requirement, as recognized in the Non-Accounting Safeguards Order, to construe any such restrictions on

¹⁸ The text in the letter following this statement reads as follows: "When you choose MCI as your local phone service carrier, you'll enjoy the convenience of receiving one consolidated easy-to-understand monthly bill."

¹⁹ See Non-Accounting Safeguards Order at ¶¶ 280-81.

²⁰ Appended hereto as Exhibits C and D and incorporated herein are several similar communications currently used by MCI to discuss its local service offerings with customers. Exhibit C is comprised of letters that are sent to MCI long distance customers, and Exhibit D contains letters sent to prospects that use other carriers' long distance services. None of these, MCI submits, violates the express joint marketing prohibitions set forth in the Commission's Non-Accounting Safeguards Order.

speech narrowly.^{21/} It is essential that the Commission apply the statute, and its Non-Accounting Safeguards Order as well, in a manner that does not infringe upon MCI's or other carriers' constitutional rights.

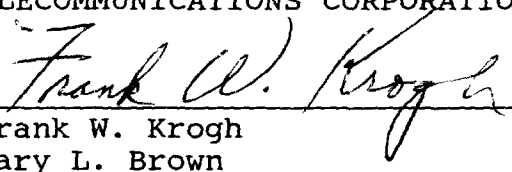
CONCLUSION

For the reasons set forth herein, the Commission should promptly grant this Petition and rule that the MCI marketing materials attached hereto are lawful in all respects. Only if the Commission makes it clear that the prohibitions in the Non-Accounting Safeguards Order will not be expanded will consumer and carrier confusion be minimized and needless litigation avoided. Otherwise, the same marketing materials will be subjected to varying legal interpretations in different jurisdictions, chilling both the exercise of First Amendment rights and the competitive marketing activities vitally needed to open up the BOCs' local service monopolies to competition.

Respectfully Submitted,

MCI TELECOMMUNICATIONS CORPORATION

BY:


Frank W. Krogh
Mary L. Brown
1801 Pennsylvania Ave, NW
Washington, DC 20006
(202) 887-2372
Its Attorneys

Dated: May 1, 1997

²¹ Non-Accounting Safeguards Order at ¶ 279, citing United States v. X-Citement Video, 115 S.Ct. 464, 467, 469 (1994).

EXHIBIT A

7C491918

Moraga, CA 94556

Dear

Finally, you have an alternative to PacBell's local service - **MCI Home Phone Service™**. With an expanded calling area that includes unlimited local and local toll calls, MCI Home Phone Service is your new choice for simpler local phone service.

**NO EXTRA CHARGES
AND NO CONFUSING RATES.**

Right now, you have to pay local toll charges any time you call outside your limited local calling area. Beyond that, there's a confusing maze of complicated rates that vary by distance and time of day. No wonder your current phone bill often requires page after page to detail how much your calls cost.

MCI Home Phone Service was created to be simple and economical. You get your current local calling area, and every call within the area mapped on the right, with no extra charges.

**GET EVERYTHING YOU SEE
FOR ONE LOW CHARGE.**

With MCI Home Phone Service, you not only get this huge calling area - you get it with the simplicity of one low, flat monthly charge of \$24.95. Whether you make 10 calls or 10,000 in your new calling area, there's no worrying over how much your bill will be, and no unexpected charges.

**ENJOY ONE CALL TO ONE COMPANY
FOR CUSTOMER SERVICE.**

As an MCI long distance customer, you know we're committed to providing the highest levels of quality and service, 24 hours a day, 7 days a week.

JUST CALL 1-800-335-0658 TODAY!

And get the convenience and value of MCI Home Phone Service. Receive one low charge for the new choice in local service. MCI -- Now from around the world to just around the corner™.

Sincerely,

Paul Barrett

Paul Barrett
MCI Regional Director, California

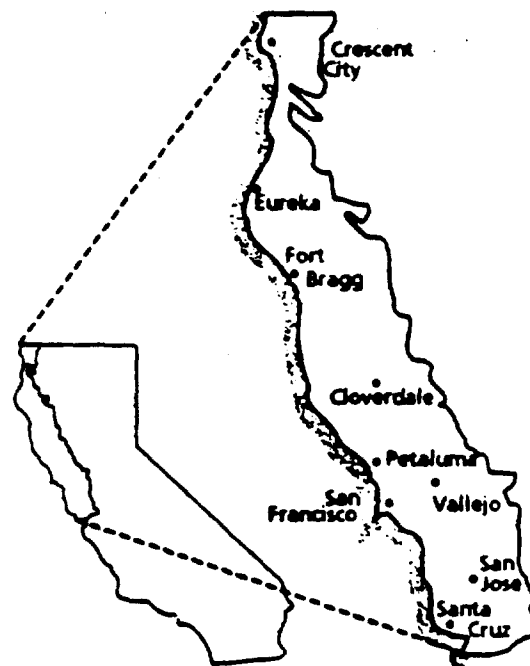
P.S. Changing your local service to MCI Home Phone Service is quick, easy and free. Call now!

MCI Home Phone Service

VALUE, SERVICE, SIMPLICITY ONLY FROM MCI.

- ▶ Talk for as long as you want, as often as you want, anywhere you want within this area.
- ▶ Get all your local calls and every local toll call on the map for one flat, monthly charge.
- ▶ Receive one easy-to-read monthly statement for both your local and long distance calls.
- ▶ Enjoy complete customer service 24 hours a day, 7 days a week, that's friendly, personal and prompt.

YOUR EXPANDED LOCAL CALLING AREA



CALL 1-800-335-0658 TODAY
and find out more about this new option
in local phone service.

With MCI, service and savings were never so simple.

Unlimited local and local toll calling with MCI Home Phone Service.*

- Make as many local and local toll calls as you like for just \$24.95 a month.
- Call anywhere in an expanded local calling area.
- Choose from a complete selection of low-cost optional service features such as Call Waiting and Call Forwarding.
- Extra phone lines available at a discount.

Automatic savings on long distance with MCI's Friends & Family.†

- Get an automatic 20% off calls from home to everyone in the U.S. when you spend as little as \$25 a month on long distance.
- Increase your savings to 25% on calls from home to other MCI residential customers.
- Enjoy 24-hour customer service that's rated #1 nationwide.‡

Joining MCI is quick and easy - there's no installation visit necessary and you don't have to change your phone number.

For more information, call today:

1 800 815-7190



*MCI is not responsible for any charges or fees incurred by our customers. †Savings are based on the national average. ‡Based on a survey conducted by the American Telephone & Telegraph Company.

© 1988 MCI Telecommunications Corporation

0877-0011-00

EXHIBIT B

John Q. Sample
Suite VELEL001
200 Berwyn Park
Berwyn, PA 19312

November 6, 1996
Telephone Number: (610) 651-2526
Account Number: 1Q234567

Dear John Q. Sample:

We are excited to announce that MCI®, the company you rely on for convenience and savings in long distance, has brought you a new choice for your local telephone service!

Introducing.... MCI Basic for HomeSM.

No matter how many local calls you make, you know they are covered with MCI Basic for Home.

A Simple Choice in Residential Phone Service.

MCI knows every family has unique calling needs, so we offer: MCI Basic for Home. For \$10.95 per line, per month you will receive unlimited local calling in your current local calling area and five free Directory Assistance calls.*

Selecting MCI Basic for Home is hassle-free. You keep your current phone number, you still have access to 411 directory assistance, 911 emergency service and you get MCI's quality customer service!

One company...one bill...one call.

When you choose MCI as your local phone service carrier, you'll enjoy the convenience of receiving one consolidated, easy- to-understand monthly bill. And if you ever have a question, an MCI Local Communications Specialists is ready to help you 24 hours a day, 7 days a week.

MCI is proud to bring you a new choice in local phone service. To start saving now with MCI Basic for Home, please call us today toll free at 1 888 MCI-LOCAL.**

Sincerely,

MCI Customer Service

*Rates for local toll calls are additional and vary according to the time of day and distance of your call. Call us for details on rates.

**Service is currently available only in the state of California, effective 9/96.

EXHIBIT C

CA
MCI BASIC FOR HOME
MCI LD CUSTOMERS

John Q. Sample
Title/Company
123 Any Street
Anytown, US 70802-7518

April 1, 1997
Telephone Number: (770) 555-5555
Account Number: 1Q234567

Dear John Q. Sample:

MCI -- the company you rely on for convenience and savings for long distance -- has some exciting news regarding your local telephone service! MCI® is pleased to offer you a new, simple alternative for local calling.

Introducing MCI Basic for Homesm

MCI Basic for Home gives you a simple local calling plan. For the low monthly rate of just \$10.95 per line, you'll have unlimited local calling plus five free Directory Assistance calls.*

The simple choice in residential phone service

Selecting MCI Basic for Home is hassle-free. You keep your current phone number, and you still have access to 411 directory assistance, 911 emergency service, and MCI's quality customer service -- 24 hours a day, 7 days a week.

Features to help make your life easier

MCI also offers all of the convenient features provided by your current local phone company, including Call Waiting, Caller ID, and Three-Way Calling. And our discount packages can help you save when you order more than one feature.

One company. One bill. One call.

And when you choose MCI for both local and long distance service, you get even more great benefits:

- One call for all your Customer Service needs
- One easy-to-read phone bill to pay each month
- One company to consult for all your communications

MCI is proud to bring you a new choice in local phone service. MCI Basic for Home offers a range of benefits you simply cannot get from any other company: low rates, convenient features, and 24-hour service.

To enjoy the simplicity of MCI Basic for Home, please call us today, toll-free, at 1 888 MCI-LOCAL.

Sincerely,

Robert Rep
MCI Customer Service

* Excludes taxes and Federal Surcharge. Additional Directory Assistance calls are billed at 25 cents each. Rates for local toll calls are additional and vary according to the time of day and distance of your call. Contact an MCI Customer Service Professional for specific rate information.

VELEL001

CA
MCI LIFELINE SERVICE
MCI LD CUSTOMERS

John Q. Sample
Title/Company
123 Any Street
Anytown, US 70802-7518

April 1, 1997
Telephone Number: (770) 555-5555
Account Number: 1Q234567

Dear John Q. Sample:

MCI -- the company you rely on for convenience and savings for long distance -- has some exciting news regarding your local telephone service!

MCI[®] is pleased to offer you a new, simple alternative for local calling.

Introducing MCI Lifelinesm

MCI Lifeline service now offers the security of always being connected at very affordable rates.

A simple and affordable way to keep in touch

With MCI Lifeline service, you'll receive one phone line, unlimited local calling and five free Directory Assistance calls for the low monthly rate of \$5.62.*

To receive MCI Lifeline service, you must return the enclosed application within 45 days and meet all qualifications as presented in the application. If you do not qualify, or do not return the application within 45 days, you will automatically receive MCI Basic for Homesm.**

One company. One bill. One call.

When you choose MCI for both local and long distance service, you get even more great benefits:

- One call for all your Customer Service needs
- One easy-to-read phone bill to pay each month
- One company to consult for all your communications

MCI is proud to bring you a new choice in local phone service. MCI Lifeline Service offers a range of benefits you simply cannot get from any other company: low rates, convenient features, and 24-hour service.

To see if you qualify for MCI Lifeline Service, please call MCI today, toll-free, at 1 888 MCI-LOCAL.

Sincerely,

Robert Rep
MCI Customer Service

* Excludes taxes. Additional Directory Assistance calls are billed at 25 cents each. Rates for local toll calls are additional and vary according to the time of day and distance of your call. Contact an MCI Customer Service Professional for specific rate information.

**MCI Basic for Home provides you with one phone line and unlimited local calling plus five free Directory Assistance calls for the low monthly rate of \$10.95.

CA
MCI BUSINESS PHONE SERVICE
MCI LD CUSTOMERS

John Q. Sample
Title/Company
123 Any Street
Anytown, US 70802-7518

April 1, 1997
Telephone Number: (770) 555-5555
Account Number: 1Q234567

Dear John Q. Sample:

MCI -- the company you rely on for convenience and savings for long distance -- has some important news regarding your local telephone service. MCI® is pleased to offer you a new, simpler alternative for local calling.

Introducing MCI Business Phone Servicesm

MCI Business Phone Service is a simple, comprehensive local calling program designed to meet all of your business needs. For a single, low monthly rate of \$20, you'll receive one phone line and up to 400 calls throughout your local calling area, plus two free Directory Assistance calls per month.* All additional local calls are billed at 3 cents per minute. Each additional phone line, including 400 local calls, is just \$15 per month.

One call for service -- 24-hours a day

MCI knows your business doesn't just run from 9 a.m. - 5 p.m. That's why MCI Business Phone Service is backed by our 24-hour a day, 7-day a week Customer Service. We're there to answer your questions and meet your needs -- so you can get back to business.

Features to help you manage your business

MCI also offers all of the convenient features provided by your current local phone company, including Call Waiting, Caller ID, and Three-Way Calling. And our discount packages can help you save when you order more than one feature.

One company. One bill. One call.

And when you choose MCI for both local and long distance service, you get even more great benefits:

- One call for all your Customer Service needs
- One easy-to-read phone bill to pay each month
- One company to consult for all your communications

The simple choice for your business

Selecting MCI Business Phone Service is hassle-free. You keep your current phone number, and you still have access to 411 directory assistance, 911 emergency service, and MCI's quality customer service -- 24-hours a day, 7 days a week.

MCI is proud to bring you a new choice in local phone service. MCI Business Phone Service offers a range of benefits you simply cannot get from any other company: unmatched simplicity, low rates, convenient features, and 24-hour service.

To enjoy the simplicity of MCI Business Phone Service, please call us today, toll-free, at 1 888 LOCAL-MCI.

Sincerely,

Robert Rep
MCI Customer Service

* Excludes taxes and Federal Surcharge. Additional Directory Assistance calls are billed at 25 cents each. Rates for local toll calls are additional and vary according to the time of day and distance of your call. Please contact an MCI Customer Service Professional for specific rate information.

VELEL015

CA
MCI BASIC FOR BUSINESS
MCI LD CUSTOMERS

John Q. Sample
Title/Company
123 Any Street
Anytown, US 70802-7518

April 1, 1997
Telephone Number: (770) 555-5555
Account Number: 1Q234567

Dear John Q. Sample:

MCI -- the company you rely on for convenience and savings for long distance -- has some important news regarding your local telephone service. MCI® is pleased to offer you a new, simple alternative for local calling.

Introducing MCI Basic for Businesssm

MCI Basic for Business is designed for businesses that don't make many local phone calls. For the low monthly rate of \$9.80, this streamlined plan provides one business phone line plus two free Directory Assistance calls per month. *

One call for service -- 24-hours a day

MCI knows your business doesn't just run from 9 a.m. - 5 p.m. That's why MCI Basic for Business is backed by our 24-hour a day, 7-day a week Customer Service. We're there to answer your questions and meet your needs -- so you can get back to business.

Features to help you manage your business

MCI also offers all of the convenient features provided by your current local phone company, including Call Waiting, Caller ID, and Three-Way Calling. And our discount packages can help you save when you order more than one feature.

One company. One bill. One call.

And when you choose MCI for both local and long distance service, you get even more great benefits:

- One call for all your Customer Service needs
- One easy-to-read phone bill to pay each month
- One company to consult for all your communications

The simple choice in business phone service

Selecting MCI Basic for Business is hassle-free. You keep your current phone number, and you still have access to 411 directory assistance, 911 emergency service, and MCI's quality customer service -- 24-hours a day, 7 days a week.

MCI is proud to bring you a new choice in local phone service. MCI Basic for Business offers a range of benefits you simply cannot get from any other company: low rates, convenient features, and 24-hour service.

To enjoy the convenience of MCI Basic for Business, please call us today, toll-free, at 1 888 LOCAL-MCI.

Sincerely,

Robert Rep
MCI Customer Service

* Excludes taxes and Federal Surcharge. Please contact an MCI Customer Service Professional for specific rate information.

VELEL005

EXHIBIT D

CA
MCI BASIC FOR HOME
MCI LD NON-CUSTOMERS

John Q. Sample
Title/Company
123 Any Street
Anytown, US 70802-7518

April 1, 1997
Telephone Number: (770) 555-5555
Account Number: 1Q234567

Dear John Q. Sample:

Here's some exciting news regarding your local telephone service from MCI -- the company that provides savings and convenience to millions of long distance customers! MCI is pleased to offer you a new, simple alternative for local calling.

Introducing MCI Basic for Homesm

MCI Basic for Home gives you a simple local calling plan. For the low monthly rate of just \$10.95 per line, you'll have unlimited local calling plus five free Directory Assistance calls.*

The simple choice in residential phone service

Selecting MCI Basic for Home is hassle-free. You keep your current phone number, and you still have access to 411 directory assistance*, 911 emergency service, and MCI's quality customer service -- 24-hours a day, 7 days a week.

Features to help make your life easier

MCI also offers all of the convenient features provided by your current local phone company, including Call Waiting, Caller ID, and Three-Way Calling. And our discount packages can help you save when you order more than one feature.

MCI is proud to bring you a new choice in local phone service. MCI Basic for Home offers a range of benefits you simply cannot get from any other company: low rates, convenient features, and 24-hour service.

To enjoy the simplicity of MCI Basic for Home, please call us today, toll-free, at 1 888 MCI-LOCAL.

Sincerely,

Robert Rep
MCI Customer Service

* Excludes taxes and Federal Surcharge. Additional Directory Assistance calls are billed at 25 cents each. Rates for local toll calls are additional and vary according to the time of day and distance of your call. Contact an MCI Customer Service Professional for specific rate information.

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